

REMARKS

Applicant respectfully requests reconsideration and allowance of all pending claims in view of the above-amendments and the following remarks.

I. CLAIM REJECTIONS UNDER §103(c)

Claims 1 and 3-22 are rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over Andy Stanford-Clark, Integrating Monitoring and Telemetry Devices as Part of Enterprise Information Resources, Websphere MQ Development, IBM software Group, pp. 1-13 (March 2002) (hereinafter “IBM Document”), in view of PETITE, U.S. Patent No. 7,103,511.

A. Claim Amendments

In view of the Examiner’s position taken in the present Advisory Action, Applicant has filed herewith an amended set of claims in which independent claim 1 (and similarly independent claim 19) has been amended in order to make the matter of pending claim 1 clearer.

The dependent claims are amended as necessary to be consistent with amendments made to the independent claims.

B. IBM Document

The IBM document concerns a general protocol for MQ Integrator SCADA device (usually named MQIsdp) developed by IBM Software Group. It deals with notions of “publish” and “subscribe”, and illustrates some examples of application.

Contrary to the IBM document, the present claims relate to a particular implementation of a set of three physical entities, namely (for example):

- **a remote terminal** (associated to one or several given applications);
- **a server** carrying out the MQIsdp protocol;
- **radiocommunication means** (those radiocommunication means are for instance integrated in a radiocommunication module or a radiocommunication device which is independent from the remote terminal to which they are associated) for ensuring the interconnection between the remote terminal and the server.

The radiocommunication means manage more specially a set of specific AT commands (comprising for example simple commands and reduced in number) that enables an external application associated to a remote terminal to dialogue with radiocommunication means and requires from the radiocommunication means execution of certain predetermined actions with the server, so that neither the remote terminal nor the associated application needs to know the MQIsdp protocol carried out by the server.

To that end, the radiocommunication means comprise more particularly (see amended claim 1):

- sending and receiving means for exchanging specific AT commands with the remote terminal;
- communication means for exchanging data with the server according to the MQIsdp protocol;
- interface means for making an interface between specific AT commands and the MQIsdp protocol carrying out by the server.

In this way, in server side, the information that the server sends or receives are in the MQIsdp format (the radiocommunication module assures the transformation to the MQIsdp format) and, in the remote terminal side, it is not necessary to know this protocol but only few specific AT commands.

Therefore, although the document IBM discloses (using the terms of amended claim 1) a system for remote controlling equipment (*« a system that manages the flow of information from remote devices to any enterprise applications that need the data », p.3, I.1-3, « telemetry integration applications », p.9, I.8*) enabling interconnection between at least one server (*« broker »*) and at least one remote equipment (*« client »*), said at least one server carrying out the MQIsdp protocol (*« this allows remote devices to connect to the broker using the MQIsdp protocol », p.9, I.2-3*), said system associating, with at least one of the said remote equipment, radiocommunication means (*« the devices communicate with the Arcom Director unit using 20-mile line-of-sight, spread-spectrum wireless links from Data-Linc Goup », p.12, I.3-4, « communicating through Very Small Aperture Terminal (VSAT) satellite links », p.13, I.3*), there

is nothing in IBM that discloses or suggests the integration of radiocommunication means, between the remote terminal and the server, that assure:

- the transformation into the MQIsdp format of specific AT commands exchanged with the remote terminal (even if this remote terminal might comprise radiocommunication means (*see page document IBM 13, line 3*));
- the transformation into specific AT commands of data/messages exchanged according to the MQIsdp protocol with the server;

so as to make an interconnection between the remote terminal and the server in a manner transparent for the application.

Due to Applicant's radiocommunication means and the implementation of a set of specific AT commands, the remote terminal, which is frequently limited in terms of resources and power (usually called "equipment of intelligence limited"), is not constrained anymore to integrate specific means (for instance a software architecture, memories, dedicated applications, etc...) to the MQIsdp protocol, the corresponding functions being handled by the radiocommunication means according to the present invention.

It shall be noted that, from the disclosure of IBM, it is not obvious for the person skilled in the art, particularly when a very simple control system is currently being developed (and adapted to remote equipments of "intelligence limited"), to carry out such an implementation, which assures data exchanges between the remote terminal(s) and a server, in the manner transparent for the applications carried by the equipment.

In addition, the IBM document does not address the problem of how to interconnect a server and a remote equipment, associated with a client application, without the terminal or the client application comprising specific means to manage the MQIsdp protocol used by the server.

There is nothing in the IBM document that discloses or suggests any of the following features of pending claim 1, for example (using the terms of amended claim 1):

- radiocommunication means comprises:
 - sending and receiving means for exchanging specific AT commands sent by and/or to be sent to an external application used by said at least one remote

equipment;

- communication means for exchanging data with said at least one server according to said MQIsdp protocol;
- interface means for making an interface between said specific AT commands and said MQIsdp protocol, so as to enable an interconnection between said at least one server and said at least one remote equipment without requiring knowledge of said MQIsdp protocol in said at least one remote equipment;
- in at least a first mode, said radiocommunication means only manage signalling of a data exchange, said data being transferred directly from said at least one remote equipment to said at least one server, or vice versa.

As a consequence and contrary to the Examiner's opinion, the IBM document does not disclose at least these features of the present claims. Accordingly, claims 1 and 2-22 are new and non-obvious in view of the cited references.

C. PETITE document (U.S. Pat. No.7 103 511 B2)

Applicant's prior remarks regarding the Petite document are incorporated herein by reference.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

WESTMAN, CHAMPLIN & KELLY, P.A.

By: /David D. Brush/
David D. Brush, Reg. No. 34,557
900 Second Avenue South, Suite 1400
Minneapolis, Minnesota 55402-3319
Phone: (612) 334-3222 Fax: (612) 334-3312

DDB:dmm